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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KENAI DRILLING LIMITED, a Delaware  
Corporation, and KENAI DRILLING  
LIMITED EMPLOYEE BENEFIT PLAN,

Plaintiffs

v.

SUN LIFE ASSURANCE COMPANY OF  
CANADA,

Defendant

Case No.: 2:24-cv-01559-CDS-EJY

**Stipulation and Order to Extend  
Deadline to File Reply to Motion  
to Dismiss**

[ECF No. 54]

Pursuant to Local Rule IA 6-1 and IA 6-2, it is hereby stipulated between Plaintiffs, Kenai Drilling Limited and Kenai Drilling Limited Employee Benefit Plan (“Plaintiffs”), by and through their counsel of record, Marquis Aurbach, and Defendant Sun Life Assurance Company of Canada (“Sun Life”), by and through their counsel of record, Figari + Davenport, LLP and Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC, that the deadline for Sun Life to file a reply to its Motion to Dismiss be extended from July 25, 2025 to **August 1, 2025**.

1. Plaintiffs filed a Petition to Compel Defendant Sun Life to Arbitration in the Eighth Judicial District Court of Nevada, on July 24, 2024.

2. Sun Life filed a Petition for Removal of Action on August 23, 2024 [ECF No. 1].

1           3.       On September 16, 2024, Sun Life filed their Response to the Petition to Compel  
2 Arbitration [ECF No. 13].

3           4.       Plaintiffs filed their Reply in Support of the Petition on October 11, 2024, including a  
4                   request for leave to file an amended complaint against Sun Life [ECF No. 27].

5           5.       On January 21, 2025, the Court issued an Order and Report and Recommendation  
6 as to the Petition to Compel, and granted Plaintiffs' motion for leave to file an amended  
7 complaint [ECF No. 33].

8           6.       Plaintiffs filed an objection to the Court's Report and Recommendation on  
9 February 4, 2025 [ECF No. 34] and filed their First Amended Complaint on April 22, 2025 [ECF  
10 No. 37].

11           7.       Pursuant to stipulation of the Parties, Sun Life filed a Motion to Dismiss [ECF No.  
12 44] in response to Plaintiffs' First Amended Complaint on June 20, 2025.

13           8.       Pursuant to stipulation of the Parties [ECF No. 46], Plaintiffs extended their  
14 deadline to file their response to Defendant's Motion to Dismiss from July 4, 2025 to July 18,  
15 2025.

16           9.       On July 18, 2025, Plaintiffs filed their Opposition to Sun Life's Motion to Dismiss  
17 [ECF No. 52].

18           10.      The Parties hereby agree to extend the deadline for Sun Life to file their reply to  
19 their Motion to Dismiss from July 25, 2025 to **August 1, 2025**.

20           11.      This Stipulation is filed before Sun Life's reply is due, is made in good faith, and  
21 is not sought for the purpose of unwarranted delay.

1 IT IS SO STIPULATED.

2 **MARQUIS AURBACH**

3 /s/ Sydney A. Soder

4 Christian T. Balducci, Esq.

5 Nevada Bar No. 12688

6 Sydney A. Soder, Esq.

7 Nevada Bar No. 17120

8 *Attorneys for Plaintiffs*

**FIGARI + DAVENPORT, LLP**

/s/ Lance V. Clack

Bill E. Davidoff (Admitted *Pro hac vice*)

Lance V. Clack (Admitted *Pro hac vice*)

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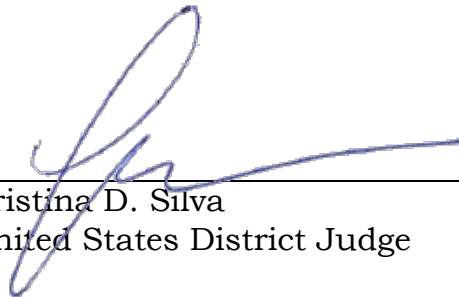
Jeremy R. Alberts

Nevada Bar No. 10497

**ATTORNEYS FOR DEFENDANT**

**SUN LIFE ASSURANCE COMPANY OF CANADA**

11 **IT IS SO ORDERED:**

12 

14 Cristina D. Silva

15 United States District Judge

16 Dated: July 28, 2025